<u>SUBJECT</u> <u>DATE</u>

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1056. Decharacterized RCRA Waste - Manifesting and LDR Reporting ENCORE APR 30, 2015	1056.	Hazardous Waste Tanks and the Less than 90-Day Accumulation Time Limit	ENCORE	APR 23, 2015
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	1100.	PCB Incineration and "Six Nines" Destruction Removal Efficiency Criteria	ENCORE	MAR 10, 2016

TWO MINUTE TRAINING

TO: CH2M HILL PLATEAU REMEDIATION COMPANY

FROM: PAUL W. MARTIN, RCRA Subject Matter Expert

CHPRC Environmental Protection, Hanford, WA

SUBJECT: PCB INCINERATION AND "SIX NINES" DESTRUCTION REMOVAL EFFICIENCY CRITERIA

DATE: *MARCH 10, 2016*

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CHPRC Projects	CH PRC - Env.	<u>MSA</u>	Hanford Laboratories	Other Hanford	Other Hanford
	Protection			Contractors	Contractors
Richard Austin		Jerry Cammann	(TBD)		
Roni Ashley	Brett Barnes	Jeff Ehlis		Bill Bachmann	Dan Saueressig
Tania Bates	Mitch Boyd	Garin Erickson	DOE RL, ORP, WIPP	Dean Baker	Merrie Schilperoort
Bob Cathel	Ron Brunke	Lori Fritz		Scott Baker	Joelle Moss
Rene Catlow	Bill Cox	Panfilo Gonzales Jr.	Mary Beth Burandt	Lucinda Borneman	Glen Triner
Richard Clinton	Laura Cusack	Dashia Huff	Duane Carter	Paul Crane	Greg Varljen
Larry Cole	Lorna Dittmer	Mark Kamberg	Cliff Clark	Tina Crane	Julie Waddoups
John Dent	Rick Engelmann	Edwin Lamm	Mike Collins	Greta Davis	Jay Warwick
Brian Dixon	Ted Hopkins	Candice Marple	Tony McKarns	Jeff DeLine	Kyle Webster
Eric Erpenbeck	Sasa Kosjerina	Saul Martinez	Ellen Mattlin	Ron Del Mar	Jeff Westcott
Stuart Hildreth	Jim Leary	Jon Perry	Greg Sinton	John Dorian	Ted Wooley
Mike Jennings	Dale McKenney	Thomas Pysto	Scott Stubblebine	Mark Ellefson	
Stephanie Johansen	Jon McKibben	Christina Robison		Darrin Faulk	
Jeanne Kisielnicki	Rick Oldham	Don Rokkan		Joe Fritts	
Melvin Lakes	Linda Petersen	Lana Strickling		Tom Gilmore	
Marty Martin	Fred Ruck	Lou Upton		Rob Gregory	
Jim McGrogan	Ray Swenson			Gene Grohs	
Stuart Mortensen	Wayne Toebe			James Hamilton	
Anthony Nagel	Lee Tuott			Andy Hobbs	
Dean Nester	Daniel Turlington			Ryan Johnson	
Dave Richards	Dave Watson			Dan Kimball	
Phil Sheely	Joel Williams			Megan Lerchen	
Connie Simiele				Richard Lipinski	
Jennie Stults				Charles (Mike) Lowery	
Michael Waters				Michael Madison	
Jeff Widney				Terri Mars	
				Cary Martin	
				Grant McCalmant	
				Steve Metzger	
				Tony Miskho	
				Matt Mills	
				Tom Moon	
				Chuck Mulkey	
				Mandy Pascual	
				Kirk Peterson	
				Jean Quigley	

TWO MINUTE TRAINING

SUBJECT: PCB Incineration and "Six Nines" Destruction Removal Efficiency Criteria

- Q: A customer is aware that an incinerator must meet "six nines" in terms of PCB nonliquid destruction and removal efficiency (DRE) but cannot find a reference for "six nines" or "99.9999%" DRE in 40 CFR 761. Where is the regulatory reference and what is the (brief) history concerning "six nines"?
- **A:** Per <u>40 CFR 761.70(b)(1)</u>, "The mass air emissions from the incinerator shall be no greater than 0.001g PCB/kg of the PCB introduced into the incinerator".

The six nines requirement is hidden in the phrase "no greater than 0.001g PCB/kg". Dividing 0.001 grams by 1 kilogram (0.001/1000) = 0.000001. Converting the result to a percentage equals 0.0001%. This means that 99.9999% of the PCBs must be destroyed and that no more than 0.0001% can be emitted to the air. [Quality Check -- 99.9999% + 0.0001% = 100%]

The DRE of six nines for non-liquid PCBs was proposed on May 24, 1977, and has remained unchanged since that time.

Concerning liquid PCBs, EPA had test data for incineration of liquids indicating that a properly operating incinerator would consistently meet the DRE of six nines. Therefore EPA deemed it unnecessary to impose the additional condition for liquid PCBs. Concerning nonliquid PCBs, EPA did not have sufficient test data to assume that the DRE of six nines would be consistently met and therefore specified the additional requirement at 40 CFR 761.70(b)(1).

SUMMARY:

- The "six nines" DRE is at 40 CFR 761.70(b)(1) in the phrase "no greater than 0.001g PCB/kg".
- Test data for liquid PCBs indicated that a properly operating incinerator consistently met the "six nines" DRE and therefore a specific regulatory condition was not necessary.
- Test data for nonliquid PCBs was not sufficient to assume "six nines" would be consistently met and therefore EPA added the additional requirement at 40 CFR 761.70(b)(1).

Excerpts from 40 CFR 761.70(a) and (b) are attached to the e-mail. If you have any questions, please contact me at "Paul_W_Martin@rl.gov" or at (509) 376-6620.

FROM: Paul W. Martin DATE: 3/10/16 FILE: c:\...\2MT\2016\031016.rtf PG: 1

TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Incineration and "Six Nines" Destruction Removal Efficiency Criteria

§761.70 Incineration

This section applies to facilities used to incinerate PCBs required to be incinerated by this part.

(a) *Liquid PCBs*. An incinerator used for incinerating PCBs shall be approved by EPA pursuant to paragraph (d) of this section. Requests for approval of incinerators to be used in more than one region must be submitted to the Director, Office of Resource Conservation and Recovery, except for research and development involving less than 500 pounds of PCB material (see § 761.60(i)(2)). Requests for approval of incinerators to be used in only one region must be submitted to the appropriate Regional Administrator. The incinerator shall meet all of the requirements specified in paragraphs (a)(1) through (9) of this section, unless a waiver from these requirements is obtained pursuant to paragraph (d)(5) of this section, In addition, the incinerator shall meet any other requirements which may be prescribed pursuant to paragraph (d)(4) of this section.

(Continued...)

- (b) *Nonliquid PCBs*. An incinerator used for incinerating nonliquid PCBs, PCB Articles, PCB Equipment, or PCB Containers shall be approved by EPA pursuant to paragraph (d) of this section. Requests for approval of incinerators to be used in more than one region must be submitted to the Director, Office of Resource Conservation and Recovery except for research and development involving less than 500 pounds of PCB material (see § 761.60(i)(2)). Requests for approval of incinerators to be used in only one region must be submitted to the appropriate Regional Administrator. The incinerator shall meet all of the requirements specified in paragraphs (b)(1) and (2) of this section unless a waiver from these requirements is obtained pursuant to paragraph (d)(5) of this section. In addition, the incinerator shall meet any other requirements that may be prescribed pursuant to paragraph (d)(4) of this section.
 - (1) The mass air emissions from the incinerator shall be no greater than 0.001g PCB/kg of the PCB introduced into the incinerator.

(Continued...)

FROM: Paul W. Martin **DATE:** 3/10/16 **FILE:** c:\...\2MT\2016\031016.rtf **PG:** 2